

EXHIBIT 313

VINCENT FRAZER
U.S. VIRGIN ISLANDS vs JP MORGAN CHASE

July 13, 2023

1

1 UNITED STATES DISTRICT COURT FOR THE

2 SOUTHERN DISTRICT OF NEW YORK

3 CASE NUMBER: 22-CV-10904-JSR

4 ACTION FOR DAMAGES

5 GOVERNMENT OF THE UNITED STATES)
6 VIRGIN ISLANDS,)

7 Plaintiff,)

8 VS.)

9 JP MORGAN CHASE BANK, N.A.,)

10 Defendant.)

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14
15 VIDEO RECORDED DEPOSITION OF

16 VINCENT FRAZER

17 THURSDAY, JULY 13, 2023

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19
20 REPORTED BY:

21 DENISE D. HARPER-FORDE
22 Certified Shorthand Reporter (CSR)
23 Certified RealTime Reporter (CRR)
24 Certified LiveNote Reporter (CLR)
25 Registered Professional Reporter (RPR)
Notary Public (FLORIDA)

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1 is our counterproposal."

2 Do you see that?

3 A. Yes.

4 Q. Was it important from your
5 perspective to try to reach some kind
6 of agreement on a proposal with
7 counsel for Mr. Epstein?

8 ATTORNEY ACKERMAN: Objection
9 to form.

10 THE WITNESS: It was no less
11 important as how -- consideration we
12 would give to any citizen that has an
13 interest in pending legislation that
14 we may be willing to hear from them.

15 (BY ATTORNEY NEIMAN):

16 Q. Uh-huh. So it's normal in
17 your practice when you're considering
18 criminal justice regulation to make
19 sure it's agreeable to the prospective
20 offenders that the legislation --

21 A. We have had --

22 Q. -- will regulate -- to the
23 prospective offenders that the
24 legislation will regulate?

25 ATTORNEY ACKERMAN: Objection

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1 to form.

2 THE WITNESS: We have had --
3 I've had -- my experience, several
4 times, in maybe legislation that is
5 pending that we receive commends and
6 concerns from defense counsel, whether
7 it be private counsel or the Public
8 Defender's Office, and we give some
9 consideration to what they may be
10 requesting.

11 It doesn't mean we would agree
12 them and put what they want in it.
13 But if we feel that it does not
14 obstruct the objective and efficacy of
15 the legislation, we would engage in
16 that discussion.

17 (BY ATTORNEY NEIMAN):

18 Q. So you're saying it would be
19 typical for you to share back and
20 forth drafts and see if you can reach
21 agreement with the offenders on
22 whether they like the legislation
23 you're proposing?

24 ATTORNEY ACKERMAN: Objection
25 to form.

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1 THE WITNESS: That's not what
2 I said.

3 (BY ATTORNEY NEIMAN):

4 Q. Okay. Would you agree that
5 that's what happened here?

6 A. No.

7 ATTORNEY ACKERMAN: Objection
8 to form.

9 (BY ATTORNEY NEIMAN):

10 Q. There wasn't a back and forth
11 with counsel for the offender?

12 ATTORNEY ACKERMAN: Objection
13 to form.

14 (BY ATTORNEY NEIMAN):

15 Q. You can answer.

16 A. I had discussions back and
17 forth with legal counsel.

18 Q. For the offender?

19 A. Maria -- Maria Hodge represent
20 a whole lot of different people. When
21 I speak to Maria -- when I speak to
22 Maria Hodge in -- in this exchange on
23 this, I am extending a courtesy to a
24 member of the Virgin Islands bar in
25 trying to craft a legislation that

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1 affects the -- the whole Virgin
2 Islands, everyone in the Virgin
3 Islands.

4 So that's who I'm negotiating
5 with. I'm not negotiating with
6 Epstein. I don't have anything with
7 Epstein. I wasn't -- I had the
8 exchange and proposals with Attorney
9 Hodge --

10 Q. All right.

11 A. -- who at the same time had, I
12 think from -- from what you show from
13 Exhibit 12 -- well, I'm sorry, one of
14 the exhibits, was having -- was
15 making -- submitting her proposal to
16 the legislature as well. So the
17 passage of the law, I mean, it comes
18 from many different sources.

19 Q. Yeah. Did you think Ms. Hodge
20 was working for anybody other than
21 Mr. Epstein?

22 A. I had an exchange with
23 Attorney Maria Hodge as a respected
24 member of the Virgin Islands bar. And
25 regardless of who she's working for, I

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1 will give her the same respect.

2 Q. That's not what I asked you,
3 sir.

4 A. Well, that's what I'm telling
5 you, that's how it is.

6 Q. Did you --

7 A. That's what -- but regardless
8 of who -- if Maria Hodge represents
9 someone who is a murderer --

10 Q. Uh-huh.

11 A. -- and there is a legislation
12 that is -- that is going through that
13 she has an interest that may have an
14 impact with her client, I will engage
15 in a discussion with her with regard
16 to the law, a proposed law, as a
17 courtesy and respect to her as a
18 respected member of the bar.

19 Q. So I'm going to resist the
20 urge here. I'll ask you a different
21 question. Let me just make sure I
22 understand who you thought Ms. Hodge
23 represented in the time that you were
24 having this dialogue. Am I correct
25 that you understood that Ms. Hodge